

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**MDL No. 2875**

**Honorable Renée Marie Bumb,  
Chief Judge**

**SPECIAL MASTER SCHEDULING ORDER**

**NOW, this 15th Day of October, 2024, IT IS HEREBY ORDERED  
THAT:**

1. A Case Management Conference for a first bellwether trial on personal injury claims in this Multi-District Litigation [“MDL”] will be held via Teams on October 22, 2024, commencing at 11:00 a.m.
2. The parties shall submit proposed agendas for the conference no later than 5:00 p.m. on October 21, 2024. An agenda letter shall be submitted on behalf of Plaintiffs and an agenda letter shall be submitted on behalf of Defendants. The matters to be presented in the agenda letters shall include, but not be limited to, the following:

- a. Identification of all bellwether cases for trial, which the parties have previously agreed to, and for which the Court's text order of October 10, 2024 (ECF No. 2899) directed the parties to prepare;
- b. The number and order in which the bellwether cases will be tried;
- c. The need for *Lexecon* waivers as to personal jurisdiction and venue, given the Court's Case Management Order No. 3;
- d. The scope of any remaining fact discovery for the bellwether cases selected for trial;
- e. The designation of deposition testimony for bellwether trials, including the extent to which the deposition designations made in contemplation of the postponed TPP trial may be used in bellwether trials;
- f. The exchange of witness and exhibit lists for the bellwether trials;
- g. The submission of proposed jury instructions;
- h. Whether defendants intend to call Maggie Kong and/or Jinsheng Lin as witnesses in the bellwether trials;
- i. An identification of any outstanding disputes regarding the reports for, or discovery of, the causation expert witnesses ;
- j. An identification of any *Daubert* issues that need to be resolved in advance of bellwether trials;

- k. The need, if any, to supplement Plaintiff Fact Sheets;
- l. A schedule for the completion of punitive damages discovery;
- m. The submission of a Final Pretrial Order; and
- n. Any other matter the parties would like to address at this time.

Dated: October 15, 2024

s/ Thomas I. Vanaskie  
Hon. Thomas I. Vanaskie (Ret.)  
Special Master